

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

LIBERTY MUTUAL FIRE
INSURANCE COMPANY,

Plaintiff,

v.

Red Roof Inns, Inc.; Red Roof
Franchising, LLC; RRI West
Management, LLC; and FMW RRI
NC, LLC,

Defendants,

and

Jane Doe #1, Jane Doe #2, Jane Doe
#3, Jane Doe #4, W.K., E.H., M.M.,
R.P., M.B., D.P., A.F., C.A., R.K.,
K.P., T.H., H.B., and K.M.,

Nominal Defendants.

CIVIL ACTION NO.
1:23-cv-02047-LMM

JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

The Parties jointly move this Court for the entry of the attached proposed Stipulated Protective Order. The Parties agree that certain documents, things, and information that may be sought in discovery contain sensitive, private, personal, and/or confidential information that should be protected from public disclosure. The parties have included in the proposed Stipulated Protective Order the specific language set forth in the Court's Standing Order Regarding Civil Litigation.

Accordingly, the Parties respectfully request that this Joint Motion for Entry of Stipulated Protective Order be granted so that discovery may proceed in an orderly manner.

Respectfully submitted, this 10th day of April, 2025.

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